

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

|                                |   |                      |
|--------------------------------|---|----------------------|
| In the Matter of               | ) |                      |
|                                | ) |                      |
| Joint Petition for Forbearance | ) |                      |
| From the Current Pricing Rules | ) | WC Docket No. 03-189 |
| for the Unbundled Network      | ) |                      |
| Element Platform               | ) |                      |

**COMMENTS OF THE VERIZON TELEPHONE COMPANIES**

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September 22, 2003

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**COMMENTS OF THE VERIZON TELEPHONE COMPANIES<sup>1</sup>**

Verizon respectfully submits these comments in support of the Joint Petition of Qwest Corporation, BellSouth Telecommunications, Inc. and SBC Communication Inc. for Expedited Forbearance (“Joint Petition”), filed July 31, 2003, in this docket. For the reasons set forth in the Petition for Expedited Forbearance of the Verizon Telephone Companies in WC Docket No. 03-157<sup>2</sup> and in the Reply Comments of Verizon Telephone Companies in Support of Petition for Expedited Forbearance in that proceeding,<sup>3</sup> both of which are incorporated by reference pursuant to the Commission’s August 18, 2003 Public Notice<sup>4</sup> (and attached hereto for the Commission’s convenience), the Commission should forbear from applying the Total Element Long Run Incremental Cost (“TELRIC”) pricing rules to the Unbundled Network Element Platform (“UNE-P”)

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<sup>1</sup> The Verizon telephone companies (“Verizon”) are the affiliated local telephone companies of Verizon Communications Inc. These companies are listed in Attachment A.

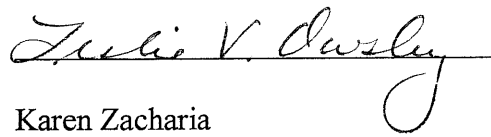
<sup>2</sup> Petition for Expedited Forbearance of the Verizon Telephone Companies, WC Docket No. 03-157 (filed July 1, 2003).

<sup>3</sup> Reply Comments of Verizon Telephone Companies in Support of Petition for Expedited Forbearance, WC Docket No. 03-157 (filed Sept. 2, 2003).

<sup>4</sup> Pleading Cycle Established for Joint Petition of Qwest, BellSouth, and SBC for Expedited Forbearance from the Commission’s Current Pricing Rules for the Unbundled Network Element Platform, WC Docket No. 189 (rel. Aug. 18, 2003) ( “[T]o the extent that a party files comments on the Verizon Petition in WC Docket No. 03-157 and desires to make identical arguments here (in WC Docket No. 03-189), a party may incorporate by reference its comments in WC Docket No. 03-157 in its filing in this docket .”).

and from the decision permitting UNE-P carriers to collect per-minute access charges from interexchange carriers. The Commission has full authority to forbear from these requirements under section 10 of the Communications Act of 1996, 47 U.S.C. §160, and forbearance is in the public interest. Accordingly, the Joint Petition should be granted.

Respectfully submitted,



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September 22, 2003

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States  
GTE Midwest Incorporated d/b/a Verizon Midwest  
GTE Southwest Incorporated d/b/a Verizon Southwest  
The Micronesian Telecommunications Corporation  
Verizon California Inc.  
Verizon Delaware Inc.  
Verizon Florida Inc.  
Verizon Hawaii Inc.  
Verizon Maryland Inc.  
Verizon New England Inc.  
Verizon New Jersey Inc.  
Verizon New York Inc.  
Verizon North Inc.  
Verizon Northwest Inc.  
Verizon Pennsylvania Inc.  
Verizon South Inc.  
Verizon Virginia Inc.  
Verizon Washington, DC Inc.  
Verizon West Coast Inc.  
Verizon West Virginia Inc.